

1 BROWNE GEORGE ROSS LLP  
2 Keith J. Wesley (State Bar No. 229276)  
3 Andrew A. August (State Bar No. 112851)  
4 Jonathan L. Gottfried (State Bar No. 282301)  
5 2121 Avenue of the Stars, Suite 2400  
6 Los Angeles, California 90067  
7 Telephone: (310) 274-7100  
8 Facsimile: (310) 275-5697

9 LIM, RUGER & KIM, LLP  
10 Bryan K. Sheldon (State Bar No. 116219)  
11 Lisa J. Yang (State Bar No. 208971)  
12 1055 W. Seventh Street, Suite 2800  
13 Los Angeles, CA 90017  
14 Telephone: (213) 955-9500  
15 Facsimile: (213) 955-9511

16 Attorneys for Plaintiff  
17 DFSB Kollektive Co. Ltd.

18 **UNITED STATES DISTRICT COURT**  
19 **CENTRAL DISTRICT OF CALIFORNIA**

20 DFSB KOLLECTIVE CO. LTD., a  
21 Korean corporation,

22 Plaintiff,

23 vs.

24 CJ E&M, INC., a Korean corporation;  
25 CJ E&M AMERICA, INC., a California  
26 corporation,

27 Defendant.

Case No. 2:15-cv-01650-SVW-FFM

**DISCOVERY MATTER:**

**NOTICE OF MOTION AND  
MOTION TO COMPEL  
DEFENDANTS TO REMOVE  
BLANKET DESIGNATION OF  
PRODUCTION AS "HIGHLY  
CONFIDENTIAL" AND FOR FEES  
& COSTS INCURRED IN  
BRINGING THIS MOTION**

Magistrate: Hon. Frederick Mumm  
Date: January 12, 2016  
Time: 10:00 a.m.  
Crtrm.: 580

Pre-Trial Conference: Feb. 22, 2016  
Trial Date: March 1, 2016  
Discovery Cut-Off Date: Feb. 1, 2016

1 PLEASE TAKE NOTICE that pursuant to Federal Rule of Civil Procedure  
2 37, and Local Rule 37-1, on January 12, 2016 at 10:00 a.m., or as soon thereafter as  
3 the matter may be heard, before the Honorable Frederick F. Mumm in Courtroom  
4 580, of the above-captioned court located at 312 North Spring Street, Los Angeles,  
5 California 90012, Plaintiff DFSB Kollektive Co. Ltd. will and hereby does move for  
6 an Order to: (1) compel the re-designation of defendants' document production to,  
7 at most, "confidential" within three days of the Court's ruling, and (2) for fees and  
8 costs associated with this motion in the amount of \$3,000.

9 The Motion is based on this Notice of Motion and Motion, the accompanying  
10 Joint Stipulation, the Declaration of Jonathan Gottfried, and exhibits thereto, and on  
11 such other and further matters as the Court may consider at or before the hearing on  
12 the Motion.

13 Pursuant to Local Rule 37-1 the Joint Stipulation was prepared following the  
14 parties' conference of counsel, which initially took place on November 9, 2015.  
15

16 DATED: December 17, 2015

Keith Wesley  
Andrew A. August  
Jonathan Gottfried  
BROWNE GEORGE ROSS LLP

Bryan K. Sheldon  
Lisa J. Yang  
LIM. RUGER & KIM. LLP

21 Bv: /s/ Jonathan Gottfried  
22 Jonathan Gottfried  
23 Attorneys for Plaintiff DFSB Kollektive  
24 Co. Ltd.  
25  
26  
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**PROOF OF SERVICE**

**STATE OF CALIFORNIA, COUNTY OF LOS ANGELES**

At the time of service, I was over 18 years of age and not a party to this action. I am employed in the County of Los Angeles, State of California. My business address is 2121 Avenue of the Stars, Suite 2400, Los Angeles, CA 90067.

On December 17, 2015, I served true copies of the following document(s) described as **DISCOVERY MATTER: NOTICE OF MOTION AND MOTION TO COMPEL DEFENDANTS TO REMOVE BLANKET DESIGNATION OF PRODUCTION AS "HIGHLY CONFIDENTIAL" AND FOR FEES & COSTS INCURRED IN BRINGING THIS MOTION** on the interested parties in this action as follows:

**SEE ATTACHED SERVICE LIST**

**BY CM/ECF NOTICE OF ELECTRONIC FILING:** I electronically filed the document(s) with the Clerk of the Court by using the CM/ECF system. Participants in the case who are registered CM/ECF users will be served by the CM/ECF system. Participants in the case who are not registered CM/ECF users will be served by mail or by other means permitted by the court rules.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that I am employed in the office of a member of the bar of this Court at whose direction the service was made.

Executed on December 17, 2015, at Los Angeles, California.

/s/ Lynne Burns  
Lynne Burns

**SERVICE LIST**

***DFSB KOLLECTIVE, CO. LTD., v. CJ E&M, INC., et al.***  
**USDC Case No. 2:15-cv-01650-SVW-FFM**

Ekwan E. Rhow  
Timothy B. Yoo  
BIRD, MARELLA, BOXER, WOLPERT,  
NESSIM, DROOKS, LINCENBERG &  
RHOW, P.C  
1875 Century Park East, 23rd Floor  
Los Angeles, California 90067-2561  
Telephone: (310) 201-2100  
Facsimile: (310) 201-2110  
[eer@birdmarella.com](mailto:eer@birdmarella.com)  
[tbv@birdmarella.com](mailto:tbv@birdmarella.com)

Attorneys for Defendants  
CJ E&M, Inc. and  
CJ E&M America, Inc.